

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4900
Facsimile: (212) 701-5988
Dennis E. Glazer
James I. McClammy

Counsel for International Bank for Reconstruction and Development

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
:
LEHMAN BROTHERS HOLDINGS, INC., *et al.* : Case No. 08-13555 (JMP)
:
Debtors. : (Jointly Administered)
:
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**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING MOTION OF INTERNATIONAL BANK FOR
RECONSTRUCTION AND DEVELOPMENT PURSUANT TO RULE
3018(a) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING
PURPOSES**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures* (the “**Second Amended Case Management Order**”), the undersigned hereby certifies as follows:

1. On October 5, 2011 International Bank for Reconstruction and Development (“**IBRD**”) filed a Motion Pursuant to Rule 3018 of the Federal Rules of Bankruptcy Procedure for Temporary Allowance of Claims for Voting Purposes (the “**Motion**”).

2. In accordance with the Second Amended Case Management Order, and consistent with the *Amended Order (I) Approving the Proposed Disclosure Statement and the Form and Manner of Notice of the Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling a Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Debtors' Joint Chapter 11 Plan*, October 14, 2011 at 4:00 p.m. (Prevailing Eastern Time) was established as the deadline for the parties to object or file a response to the Motion (the “**Objection Deadline**”). The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections have been filed prior to the relevant Objection Deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Objection Deadline has now passed and, to the best of my knowledge, no objections or other responsive pleadings to the Motion have been filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, nor has any objection or other responsive pleading with respect to the Motion been served on IBRD’s counsel.

4. Accordingly, for the reasons set forth in the Motion, IBRD respectfully requests that the proposed Order granting the Motion, annexed hereto as Exhibit A and unmodified since the filing of the Motion, be entered in accordance with the procedures described in the Second Amended Case Management Order.

5. I declare that the foregoing is true and correct.

Dated: New York, New York
October 20, 2011

Davis Polk & Wardwell LLP

By: s/ James I. McClammy

Dennis E. Glazer

James I. McClammy

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New York, New York 10017
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*Counsel for International Bank for
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EXHIBIT A
(Proposed Order)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
:
LEHMAN BROTHERS HOLDINGS, INC., *et al.* : Case No. 08-13555 (JMP)
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Debtors. : (Jointly Administered)
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**ORDER GRANTING MOTION OF INTERNATIONAL BANK FOR
RECONSTRUCTION AND DEVELOPMENT PURSUANT TO RULE
3018(a) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING
PURPOSES**

Upon the Motion¹ of International Bank for Reconstruction and Development for entry of an order, pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure, temporarily allowing the IBRD Claims for the purpose of voting to accept or reject the Plan; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and after due deliberation thereon, and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

¹ All capitalized terms shall have the meanings ascribed to them in the Motion of International Bank for Reconstruction and Development Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporary Allowance of Claims for Voting Purposes.

2. The LBSF Claim (Claim No. 18977) shall be and hereby is temporarily allowed in the amount of \$11,757,799.75, for the purpose of voting to accept or reject the Plan.

3. The LBHI Claim (Claim No. 18976) shall be and hereby is temporarily allowed in the amount of \$11,757,799.75, for the purpose of voting to accept or reject the Plan.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: New York, New York
November __, 2011

HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE